

1 MAGISTRATE JUDGE
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

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9 UNITED STATES OF AMERICA,)
10 Plaintiff,) NO. 23-MJ-05000
11 vs.) MOTION AND MEMORANDUM
12 JEREMY CRAHAN,) FOR RELEASE FROM
13 Defendant.) DETENTION FOR MEDICAL
14) ATTENTION
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COMES NOW the defendant, Jeremy Crahan, by and through his attorney, Lance M. Hester of the Hester Law Group, Inc., P.S., and moves this Court for an order releasing the defendant from detention for purposes of seeking medical attention.

THIS MOTION is based on the files and records herein and upon the memorandum filed in support thereof.

DATED this 15th day of February, 2023.

HESTER LAW GROUP, INC., P.S.
Attorneys for Defendant

By: /s/ Lance M. Hester
LANCE M. HESTER
WSB #27813

INTRODUCTION

2 Mr. Jeremy Crahan was ordered detained while his case is pending. At the time of his
3 detention, the Court was informed Mr. Crahan was suffering a medical condition, including
4 blood clotting. Since that time, the FDC transported Mr. Crahan to a medical facility at a
5 time when the FDC had ignored his plight to the point of Mr. Crahan suffering a medical
6 emergency. He stayed there approximately 5 days, under what he describes as a near death
7 existence. His care at the FDC since that time has been reported as substandard, inhumane,
8 and below indifferent.

RELIEF REQUESTED

10 The defense asks the Court to release Mr. Crahan on electronic monitoring, and to
11 permit him to stay at his parents' residence.

ARGUMENT

13 Addressing the unfavorable information first, the defense is well aware that Mr.
14 Crahan has a significant criminal history. It is also aware of what appears to be one or
15 maybe two warrants for minor offenses in the area. This case, however, has included the
16 most attention that has ever been focused on Mr. Crahan. His history has him solidly
17 grounded in Western Washington. His family is nearby and has opened its home to him
18 while charges are pending as well.

19 Most importantly, Mr. Crahan has medical needs that need immediate and proper
20 attention so he does not return to a near-death existence and run the risk of actual death
21 again.

22 Mr. Crahan reports that he became septic at a time shortly following our last hearing
23 on this case. He was suffering the bloating and inflamed consequences of blood clotting, and
24 his blood got infected. Mr. Crahan reports his condition deteriorated to the point where the
25 FDC arranged for his transport to a local hospital, believed to be Highline Hospital.

1 According to Mr. Crahan, It took Highline Hospital five days to stabilize him to the
2 point of discharging him returned to the FDC. His discharge included prescription anti-
3 biotics and possibly other medications designed to continue him on a trajectory of healing, as
4 he had not completely healed at that time.

5 The FDC care provided since his return has been inhumane and without regard for his
6 prior suffering, and appears to be sending Mr. Crahan in a trajectory that will again put him
7 in a life-threatening situation. In short, since his return to the FDC a few weeks ago, Mr.
8 Crahan's condition has worsened. Crahan has submitted regular "kites" for medical
9 attention, and he has inquired about the poor care he is receiving. He has reported that
10 medical staff have taken the liberty to cut his anti-biotic dosing in half, and have told him
11 that it is because they have not refilled the prescription. One nurse said he does not get better
12 care because he's the "grinch who stole Christmas,"(referencing his pending criminal
13 charges).

14 Mr. Crahan describes his current condition as painful and bloated. He describes it as
15 worsening. And, because he reports approaching death's door when he was transported in
16 January, he is experiencing tremendous anxiety about his apparent reversible condition. He
17 is desperate for proper care to relieve the symptoms, anxiety, and restore him in a direction
18 aimed at full health, rather than persisting with a hanging on tendency toward death.

19 The Court should release Mr. Crahan to electronic home confinement on an
20 appearance bond, and allow for whatever medical appointments are deemed necessary by
21 medical providers. Mr. Crahan is equipped with state medical insurance. His father is retired
22 and presumably available to transport him to such services. He is not a flight risk as he's too
23 bloated, inflamed, and poisoned to do much at all right now.

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CONCLUSION

The defendant respectfully requests the relief as set forth above.

DATED this 15th day of February, 2023.

HESTER LAW GROUP, INC., P.S.
Attorneys for Defendant

By: /s/ Lance M. Hester
LANCE M. HESTER
WSB #27813

CERTIFICATE OF SERVICE

Lee Ann Mathews, hereby certifies under penalty of perjury under the laws of the State of Washington, that on the date set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the plaintiff and co-defendants, if any, and hereby certify that I have mailed the document by U.S. Postal Service to Jeremy Crahan, defendant.

Signed at Tacoma, Washington this 15th day of February, 2023.

/s/ Lee Ann Mathews
LEE ANN MATHEWS